

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Michael Carrabes,

Plaintiff,

v.

Expeditors International of
Washington, Inc.,

Defendant.

No. 1:24-CV-12142-AK

SECOND AFFIDAVIT OF ADAM CLERMONT

I, Adam Clermont depose and state as follows:

1. My name is Adam Clermont. I am an attorney duly licensed to practice law in the Commonwealth of Massachusetts and am counsel of record for Plaintiff Michael Carrabes in the above-captioned matter. I make this affidavit in support of Plaintiff's Memorandum in Response to Defendant's Motion to Set a Status Conference.
2. I have personal knowledge of the facts set forth in this affidavit, and if called upon to testify, I could and would testify competently to these facts.

3. On or about January 8, 2025, I received a letter from Mr. Stephen Willey, who represents Defendant Expeditors International of Washington, Inc. ("Defendant"), accusing me of being responsible for sending anonymous emails from Proton email accounts and recording a Court Zoom proceeding without authorization. These allegations are entirely baseless and unsupported by any evidence. A copy of the letter is attached hereto as Exhibit 1.
4. I have repeatedly requested that Defendant retract its unfounded allegations against me, but Defendant has refused to do so. These accusations are not only false but also highly prejudicial to my professional reputation and the integrity of these proceedings.
5. I am currently based in Hong Kong and underwent surgery on January 23, 2025.
6. Prior to my surgery, my treating gastroenterologist advised me to avoid flying for at least two months. This period may be expanded depending on my recovery, A note from my doctor is attached as Exhibit 2.

Signed under the pains and penalties of perjury this 6th
day of February 2024.

/s/ Adam Clermont
Adam Clermont